

Parties Listed On Signature Page

"E-FILED - 9/24/08"

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,  
Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., et al.,  
Defendant.

CASE NO.: C 05-00334 RMW

**STIPULATION AND ORDER TO EXTEND THE DEADLINES  
FOR MCALEXANDER DEPOSITION AND  
ANY RELATED DAUBERT BRIEFING**

Judge: Hon. Ronald M. Whyte  
Courtroom: 6

RAMBUS INC.,  
Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,  
et al.,

Defendant.

CASE NO.: C 05-02298 RMW

RAMBUS INC.,  
Plaintiff,

vs.

MICRON TECHNOLOGY INC., et al,  
Defendants.

CASE NO. C-06-00244 RMW

1 WHEREAS, the expert discovery cutoff for the jury trial commencing on January  
2 19, 2009 (the "January 19 Trial") was set for October 10, 2008 by Order dated July 16, 2008;

3 WHEREAS, the Court's Order of July 16, 2008 provides that *Daubert* motions  
4 must be filed by October 17, 2008, with oppositions due by October 31, 2008, and replies due by  
5 November 7, 2008;

6 WHEREAS, the Manufacturers' expert Mr. McAlexander is not available for  
7 deposition until October 14, 2008;

8 WHEREAS, the parties have agreed that Mr. McAlexander's deposition relating to  
9 his invalidity report may be taken on October 14, 2008 if Rambus can file any *Daubert* motion  
10 related to Mr. McAlexander's testimony on or before October 21, 2008;

11 WHEREAS, the Manufacturers have requested a corresponding extension of the  
12 filing dates for the opposition and reply to any such *Daubert* motion;

13 WHEREAS, the parties agree that this extension will not impact the January 19,  
14 2009 trial date;

15 WHEREAS, the parties have agreed to the following briefing schedule for any  
16 *Daubert* motion related to Mr. McAlexander;

17 NOW, THEREFORE, IT IS ORDERED THAT

18 The close of expert discovery in the above-caption actions shall be extended to  
19 accommodate the agreement of counsel regarding Mr. McAlexander's deposition set forth above;

20 Rambus shall file any *Daubert* motion relating to Mr. McAlexander on or before  
21 October 21, 2008;

22 The Manufacturers will file their opposition to any such motion on or before  
23 November 4, 2008;

24 Rambus will file its reply on or before November 11, 2008.

25 SO ORDERED

26 DATED: \_\_\_\_\_

9/24/08

*Ronald M. Whyte*

The Honorable Ronald M. Whyte

District Judge

1 DATED: September 19, 2008

MUNGER, TOLLES & OLSON LLP

2 SIDLEY AUSTIN LLP

3 McKOOL SMITH P.C.

4 By: /s/ Jennifer L. Polse  
5 JENNIFER L. POLSE

6 Attorneys for RAMBUS INC.

7 DATED: September 19, 2008

THEODORE BROWN III  
8 TOWNSEND and TOWNSEND and CREW,  
9 LLP

10 By /s/ Theodore Brown III  
THEODORE BROWN III

11 Attorneys for HYNIX SEMICONDUCTOR  
12 INC., HYNIX SEMICONDUCTOR  
13 AMERICA INC., HYNIX  
14 SEMICONDUCTOR MANUFACTURING  
15 AMERICA INC., HYNIX  
16 SEMICONDUCTOR U.K. LTD., and HYNIX  
17 SEMICONDUCTOR DEUTSCHLAND  
18 GmbH

19 DATED: September 19, 2008

SVEN RAZ  
20 WEIL, GOTSHAL & MANGES LLP

21 By: /s/ Sven Raz  
SVEN RAZ

22 Attorneys for MICRON TECHNOLOGY  
23 INC., et. al.

24 DATED: September 19, 2008

MATTHEW ANTONELLI  
25 WEIL, GOTSHAL & MANGES LLP

26 By: /s/ Matthew Antonelli  
MATTHEW ANTONELLI

27 Attorneys for SAMSUNG ELECTRONICS  
28 CO., LTD., SAMSUNG ELECTRONICS  
AMERICA, INC., SAMSUNG  
SEMICONDUCTOR, INC., AND SAMSUNG  
AUSTIN SEMICONDUCTOR, L.P.

1 DATED: September 19 , 2008

THERESA E. NORTON  
ORRICK HERRINGTON & SUTCLIFFE  
LLP

2  
3  
4 By: /s/ Theresa E. Norton  
THERESA E. NORTON

5 Attorneys for NANYA TECHNOLOGY  
6 CORPORATION and NANYA  
7 TECHNOLOGY CORPORATION USA

8 Filer's Attestation:

9 I, Jennifer L. Polse, am the ECF user whose identification and password are being used to  
10 file this **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINES**  
11 **FOR THE MCALEXANDER DEPOSITION AND ANY RELATED DAUBERT**  
12 **BRIEFING**. In compliance with General Order 45.X.B, I hereby attest that Theodore Brown,  
13 Sven Raz, Matthew Antonelli and Theresa Norton concur in this filing.

14 By: /s/ Jennifer L. Polse  
15 Jennifer L. Polse  
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